UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE US, INC., T-MOBILE USA, INC., and SPRINT CORP.,

Defendants.

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE US, INC., T-MOBILE USA, INC., and SPRINT CORP.,

Defendants.

Civil Action No. 2:23-cv-00379-JRG-RSP

(Lead Case)

JURY DEMANDED

Civil Action No. 2:23-cv-00377-JRG-RSP

(Member Case)

JURY DEMANDED

JOINT MOTION FOR ENTRY OF AGREED ORDER REGARDING E-DISCOVERY

Pursuant to the Discovery Order (D.I. 43) setting a deadline to file a proposed Order Regarding E-Discovery, Plaintiff Headwater Research, LLC ("Headwater") and Defendants T-Mobile USA, Inc. ("T-Mobile USA") and Sprint Corp. ("Sprint") (collectively, "T-Mobile" or "Defendants"), (all together, the "Parties") hereby jointly request that the Court enter the proposed Order Regarding E-Discovery.

¹ The Parties have filed a joint motion to dismiss T-Mobile US, Inc. from this action (Dkt. No. 46), such that this order only binds the other named defendants.

Dated: January 25, 2024

/s/ Katherine Q. Dominguez

Katherine Q. Dominguez (NY Bar No. 4741237)

kdominguez@gibsondunn.com

Josh A. Krevitt

(NY Bar No. 2568228) jkrevitt@gibsondunn.com

Brian Rosenthal

(NY Bar No. 3961380) brosenthal@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP

200 Park Avenue

New York, NY 10166-0193 Telephone: (212) 351-4000 Facsimile: (212) 351-4035

Robert Vincent

rvincent@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP

2001 Ross Avenue, Suite 2100 Dallas, Texas 75201-2923 Telephone: (214) 698-3100 Facsimile: (214) 571-2900

Andrew W. Robb (CA Bar No. 291438) arobb@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP

310 University Ave Palo Alto, CA 94301

Telephone: (650) 849-5300

Melissa R. Smith

melissa@gillamsmithlaw.com

GILLIAM & SMITH, LLP

303 South Washington Avenue

Marshall, TX 75670

Telephone: (903) 934-8450 Facsimile: (903) 934-9257

Attorneys for Defendants

/s/ Marc Fenster

Marc Fenster

CA State Bar No. 181067 Email: mfenster@raklaw.com

Reza Mirzaie

CA State Bar No. 246953 Email: rmirzaie@raklaw.com

Brian Ledahl

CA State Bar No. 186579 Email: bledahl@raklaw.com

Ben Wang

CA State Bar No. 228712 Email: bwang@raklaw.com

Dale Chang

CA State Bar No. 248657 Email: dchang@raklaw.com

Paul Kroeger

CA State Bar No. 229074 Email: pkroeger@raklaw.com

Neil A. Rubin

CA State Bar No. 250761 Email: nrubin@raklaw.com

Kristopher Davis

CA State Bar No. 329627 Email: kdavis@raklaw.com

James S. Tsuei

CA State Bar No. 285530 Email: jtsuei@raklaw.com

Philip Wang

CA State Bar No. 262239 Email: pwang@raklaw.com

Amy Hayden

CA State Bar No. 287026 Email: ahayden@raklaw.com

Jason M. Wietholter

CA State Bar No. 337139

Email: jwietholter@raklaw.com RUSS AUGUST & KABAT

12424 Wilshire Blvd. 12th Floor Los Angeles, CA 90025

Telephone: 310-826-7474

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 25th day of January 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster